

DOCKET NO. FST CV19-5022501S : SUPERIOR COURT  
ALLYN HOLMBERG : JUDICIAL DISTRICT OF  
V. : STAMFORD/NORWALK  
PAUL SAITTA, ET AL. : MARCH 18, 2020

**ANSWER TO COMPLAINT**

Defendant, Paul Saitta, hereby responds to plaintiff's Complaint dated January 6, 2020, as follows:

**FIRST COUNT**

1. Defendant lacks sufficient information or knowledge upon which to form a belief and therefore leaves plaintiff to her proof.
2. Paragraph 2 is admitted.
3. Defendant admits only that he was the owner of the dog named "Sarge" and was the temporary keeper of the dog named "Bane." The remaining allegations in paragraph 3 are denied.
- 4 – 8. Paragraphs 4 through 8 are denied.

**SECOND COUNT**

1. The answers to paragraphs 1 through 7 of the First Count are hereby incorporated by reference as the answers to paragraphs 1 through 7 of the Second Count.
- 8 – 9. Paragraphs 8 through 9 are denied.

**THIRD COUNT**

The allegations in the Third Count are not addressed to this defendant and therefore no response is made thereto.

#### **FOURTH COUNT**

The allegations in the Fourth Count are not addressed to this defendant and therefore no response is made thereto.

#### **FIFTH COUNT**

The allegations in the Fifth Count are not addressed to this defendant and therefore no response is made thereto.

#### **FIRST SPECIAL DEFENSE – CONTRIBUTORY NEGLIGENCE**

If plaintiff sustained any injuries, losses and/or damages as she alleges in her Complaint, then her own negligence was a substantial factor in causing the occurrence complained of and those injuries, losses and/or damages in that:

1. She failed to make reasonable and proper use of her faculties and senses at the time and place of the incident alleged in the Complaint;
2. She failed to exercise reasonable care for her safety at the time and place of the incident alleged in the Complaint; and,
3. She failed to act as a reasonably prudent person would have under the same or similar circumstances at the time and place of the incident alleged in the Complaint.

DEFENDANT,  
PAUL SAITTA

/s/ Rebecca N. Brindley  
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**CERTIFICATION**

THIS IS TO CERTIFY THAT a copy of the foregoing was emailed, this 18th day of  
March, 2020 to the following counsel of record:

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/s/ Rebecca N. Brindley  
Commissioner of the Sup. Ct.